

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
MARSHALL DIVISION

OPTIS WIRELESS TECHNOLOGY, LLC,  
OPTIS CELLULAR TECHNOLOGY, LLC,  
UNWIRED PLANET, LLC, UNWIRED  
PLANET INTERNATIONAL LIMITED,  
AND PANOPTIS PATENT MANAGEMENT,  
LLC,

Plaintiffs,

v.

APPLE INC.,

Defendant.

Civil Action No. 2:19-cv-66-JRG

JURY TRIAL

**PANOPTIS' NOTICE OF POTENTIAL TRIAL CONFLICT**

PanOptis submits this Notice of Potential Trial Conflict to inform the Court of a conflict involving PanOptis' lead trial counsel, Jason Sheasby.

Mr. Sheasby is lead trial counsel for the City of Pomona in *City of Pomona v. SQM North America Corp.*, Case No. 2:11-cv-00167-RGK-JEM, before Judge Klausner in the Central District of California. He first appeared as counsel for City of Pomona on August 25, 2020. *Id.*, Dkt. 598. The case relates to pollution in Pomona's groundwater allegedly caused by SQM North America. All trials in the Central District of California were suspended for a period of time because of COVID-19. As a result, on February 24, 2021, Judge Klausner *sua sponte* rescheduled trial for August 3, 2021. *Id.*, Dkt. 614. The case has been pending for more than a decade. The City of Pomona asked SQM North America to agree to a short continuance in an attempt to address the conflict. SQM North America agreed. The parties are now presenting the issue to Judge Klausner.

PanOptis will promptly update the Court as soon as it receives a determination from Judge Klausner.

Dated: June 7, 2021

Respectfully submitted,

/s/ Jason Sheasby

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**ATTORNEYS FOR PLAINTIFFS OPTIS  
WIRELESS TECHNOLOGY, LLC, OPTIS  
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**CERTIFICATE OF SERVICE**

The undersigned certifies that the foregoing document was served via the Court's ECF system mail on all counsel of record on June 7, 2021.

*/s/ Jason Sheasby*  
Jason Sheasby